

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

NEW HAMPSHIRE INDONESIAN  
COMMUNITY SUPPORT; LEAGUE OF  
UNITED LATIN AMERICAN CITIZENS;  
and MAKE THE ROAD NEW YORK,

*Plaintiffs,*

v.

DONALD J. TRUMP, et al.,

*Defendants.*

Case No. 1:25-cv-00038-JL-TSM

**ASSENTED-TO MOTION FOR THE ADMISSION, *PRO HAC VICE*, OF  
ELLE HUMPHREY AS COUNSEL FOR PLAINTIFFS**

1. Pursuant to Rule 83.2(b) of the Local Rules of the United States District Court for the District of New Hampshire, Indonesian Community Support, Legal of United Latin American Citizens, and Make the Road New York (“Plaintiffs”) respectfully move this court for an order admitting Ms. Morgan Elle Humphrey to the bar of this Court, *pro hac vice*, for the purpose of representing Plaintiffs in the above-captioned case. Ms. Humphrey is knowledgeable regarding the dispute between the parties, and it would be economical and efficient to allow Ms. Humphrey to appear before this Court.

2. Ms. Humphrey is a member in good standing of the bar of New Jersey State; she is not suspended or disbarred in any jurisdiction or involved in any disciplinary proceedings; and she has never had *pro hac vice* status denied or revoked by any court. An affidavit attesting to these facts is attached.

3. For the foregoing reasons, Plaintiffs respectfully request that this Court grant this motion and enter an order for admission of Ms. Humphrey *pro hac vice* in the above-captioned case.

4. Defendants assent to the relief requested in this Motion.

5. **Certificate of Concurrence:** Pursuant to Local Rule 7.1(c), undersigned counsel for Plaintiffs certify that Plaintiffs have made a good faith attempt to obtain concurrence in the relief sought. Plaintiffs sought concurrence on January 22, 2025 and had not yet obtained assent by the time of filing on the same date.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court:

A. Grant this Motion for Admission *Pro Hac Vice* of; and

B. Grant such other and further relief as may be just and equitable.

Date: January 22, 2025

Respectfully submitted,

/s/ Gilles Bissonnette

SangYeob Kim (N.H. Bar No. 266657)

Gilles R. Bissonnette (N.H. Bar No. 265393)

Henry R. Klementowicz (N.H. Bar. No. 21177)

Chelsea Eddy (N.H. Bar No. 276248)

AMERICAN CIVIL LIBERTIES UNION OF NEW  
HAMPSHIRE FOUNDATION

18 Low Avenue

Concord, NH 03301

(603) 224-5591

sangyeob@aclu-nh.org

gilles@aclu-nh.org

henry@aclu-nh.org

chelsea@aclu-nh.org

*Counsel for Plaintiffs*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

NEW HAMPSHIRE INDONESIAN  
COMMUNITY SUPPORT; LEAGUE OF  
UNITED LATIN AMERICAN CITIZENS;  
and MAKE THE ROAD NEW YORK,

*Plaintiffs,*

v.

DONALD J. TRUMP, et al.,

*Defendants.*

Case No. 1:25-cv-00038-JL-TSM

**AFFIDAVIT OF MORGAN ELLE HUMPHREY**

I, Morgan Elle Humphrey, do hereby depose and swear as follows:

1. In accordance with Local Rule 83.2(b)(1)(A), I am an attorney at the NAACP Legal Defense & Educational Fund, Inc. My office address is 700 14th Street NW, Suite 600, Washington, D.C. 20005. My email address is mhumphrey@naacpldf.org, and my telephone number is (212) 965-2200.

2. In accordance with LR 83.2(b)(1)(B), the following are the courts in which I am admitted to practice, along with the years and dates of my admission:

a. New Jersey State Bar, admitted since February 22, 2022

3. In accordance with LR 83.2(b)(1)(C), I am a member in good standing and eligible to practice in the above-listed courts.

4. In accordance with LR 83.2(b)(1)(D), I am not currently and have never been suspended or disbarred in any jurisdiction.

5. In accordance with LR 83.2(b)(1)(E)(1), I have not been denied admission to practice before any court.

6. In accordance with LR 83.2(b)(1)(E)(2), I have not previously been disciplined by any court, nor am I subject to any pending disciplinary matters.

7. In accordance with LR 83.2(b)(1)(E)(3), I have not been convicted of any felony or misdemeanor crimes.

8. In accordance with LR 83.2(b)(1)(F), I have not been denied admission to practice before any court, and no court has denied or revoked my pro hac vice status.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Date: January 22, 2025

Respectfully submitted,

/s/ Morgan Elle Humphrey

Morgan Elle Humphrey  
NAACP Legal Defense & Educational Fund, Inc.  
40 Rector Street, Fifth Floor  
New York, NY 10006  
(212) 965-2200  
mhumphrey@naacpldf.org